

January 27, 2004

VIA HAND DELIVERY

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, Second Floor
Boston, Massachusetts 02110

RE: Western Massachusetts Electric Company, D.T.E. 03-87

Dear Secretary Cottrell:

In its November 28, 2003 report relative to a plan to eliminate the backlog of double utility poles within the Commonwealth, pursuant to Chapter 46 of the Acts of 2003, Section 110 ("Report"), the Department of Telecommunications and Energy ("Department") required pole owners to submit within 60 days of this Report detailed plans for eliminating the backlog of double poles as soon as reasonably practicable. Report, pp. 15-16. This letter details Western Massachusetts Electric Company's ("WMECO") plan for eliminating the backlog of double poles.

Background

WMECO serves 59 municipalities in western Massachusetts. WMECO has a total inventory of 137,000 poles, 105,000 of which are jointly owned with Verizon Massachusetts ("Verizon MA"). WMECO is the pole custodian, the company responsible for setting and removing poles, in 30 municipalities. Verizon MA is the pole custodian in 18 municipalities. In the remaining 11 municipalities, WMECO and Verizon MA share pole custodian responsibilities. During calendar-year 2002, WMECO participated with Verizon MA, Fitchburg Gas and Electric, NSTAR Electric (Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company), and Massachusetts Electric Company and Nantucket Electric Company, on a collaborative team ("Collaborative Team") to design and implement a web-based, pole inventory database and project management tool to track and manage double poles in Massachusetts. Inquest Technologies ("Inquest") was chosen as the vendor to provide the web-based management system called Pole Lifecycle Management ("PLM System"). WMECO began fully implementing the PLM System in February 2003.

Present Status of Double Poles in WMECO's Service Territory

Presently the PLM System shows there are a total of 905 double poles in the 59 communities WMECO serves. Of that number, 63 poles are owned by other electric utilities in towns where more than one electric company has poles installed. That leaves a total of 842 poles that are

either owned solely by WMECO, solely by Verizon MA, or owned jointly between WMECO and Verizon MA. Below is a listing of the number of poles in various statuses:

<u>Total</u> <u>Double Poles</u>	<u>WMECO</u> <u>to Shift</u>	<u>Verizon MA</u> <u>to Shift</u>	<u>Others to</u> <u>Shift</u>	<u>Ready to Remove-</u> <u>WMECO</u>
842	95	564	20	119

Plans to Eliminate the Backlog of Double Poles

The following actions have been undertaken to eliminate the backlog of double poles within WMECO's service territory:

- A. Poles Ready to Remove:** As a first step, WMECO will be addressing the poles that are ready to remove. WMECO plans to remove the 119 poles that are ready to be removed by April 15, 2004.
- B. Pole Transfers:** WMECO has a total of 95 poles where it must transfer its facilities from the old pole to the new pole. These 95 transfers will be completed by June 1, 2004.
- C. Survey:** As the PLM System has been implemented, some start-up data errors have been identified. In a few municipalities, WMECO has discovered there were more double poles than were shown in the PLM System. WMECO re-surveyed these municipalities and entered the correct data. This experience may mean that certain other double-pole information for other communities is inaccurate and re-surveying is ongoing to ensure the accuracy of the data. The re-survey will be completed by June 1, 2004.
- D. Complete Full Implementation of the PLM System:** The PLM System is a paperless, electronic transfer notice system that is substantially different than the system previously in place. It requires a good deal of training and familiarity with its use. WMECO experienced some difficulty in getting its work management system and planning process working in conjunction with the PLM System so progress was slow but steady. WMECO is still resolving some training and use issues. Discussion of double pole status in WMECO is part of monthly Operations Meetings. WMECO will address the training and use issues by March 1, 2004.
- E. Monthly Meetings with Verizon MA:** WMECO and Verizon MA have been conducting joint monthly meetings to discuss all joint pole work in the WMECO Service Territory. Double pole discussions are a part of these meetings.
- F. Meetings with Third-Party Attachees:** Third-party attachees in the WMECO service territory do not appear to be a significant obstacle to removing double poles. At the present time, there are only 20 transfers pending with Fire, Private, CATV, or fiber-optic attachees. There has not been difficulty in getting these third-party attachees to transfer their facilities on a timely basis. WMECO will meet with third-party attachees to enforce transfer completions as necessary.
- G. Continued Participation on the Collaborative Team to Improve the Functionality of the PLM System:** The Collaborative Team, that worked on the development and implementation of the PLM System as a tool to manage double pole activity, continues to

meet and work with Inquest in efforts to identify opportunities for enhancing the PLM System to provide better system functionality and reporting capabilities. There are a number of enhancements that have been identified and Inquest is working to provide a new release of their system toward the latter part of 2004.

Conclusion

Progress is being made in the removal of double poles in WMECO's service territory. The PLM System is proving to be an effective tool in managing double pole activity. WMECO is committed to work toward the elimination of the double pole backlog in the towns that it serves.

Please contact me or John Tulloch at telephone (413)787-9018, or email: tullojs@nu.com, should you have any questions in regard to this filing.

Very truly yours,

Donald M. Bishop
Manager, Regulatory Policy - Massachusetts

cc: William H. Stevens, Jr., Hearing Officer